

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5**

**IN THE MATTER OF:**

Olin Corporation, Winchester Division  
600 Powder Mill Road  
East Alton, Illinois 62024

**ATTENTION:**

Michael L. Roark

Director, Environmental, Health & Safety  
Olin Corporation, Winchester Division

**Request to Provide Information Pursuant to the Clean Air Act**

The U.S. Environmental Protection Agency is requiring Olin Corporation, Winchester Division (Winchester or you), to submit certain information about your facility in East Alton, Illinois. Appendix A provides the instructions needed to answer this information request, including instructions for electronic submissions. Appendix B specifies the information that you must submit. You must send this information to us according to the schedule in Appendix B.

We are issuing this information request under Section 114(a) of the Clean Air Act (the CAA), 42 U.S.C. § 7414(a). Section 114(a) authorizes the Administrator of EPA to require the submission of information. The Administrator has delegated this authority to the Director of the Air and Radiation Division, Region 5.

Winchester owns and operates an emission source at the East Alton, Illinois facility. We are requesting this information to determine whether your emission source is complying with the Illinois State Implementation Plan and the health standards established in the Clean Air Act.

Winchester must send all required information to:

Attn: Compliance Tracker, AE-17J  
Air Enforcement and Compliance Assurance Branch  
U.S. Environmental Protection Agency  
Region 5  
77 W. Jackson Boulevard  
Chicago, Illinois 60604

Winchester must submit all required information under an authorized signature with the following certification:

I certify under penalty of law that I have examined and am familiar with the information in the enclosed documents, including all attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are, to the best of my knowledge and belief, true and complete. I am aware that there are significant penalties for knowingly submitting false statements and information, including the possibility of fines or imprisonment pursuant to Section 113(c)(2) of the Clean Air Act and 18 U.S.C. §§ 1001 and 1341.

As explained more fully in Appendix C, you may assert a claim of business confidentiality under 40 C.F.R. Part 2, Subpart B for any part of the information you submit to us. Information subject to a business confidentiality claim is available to the public only to the extent, and by means of the procedures, set forth at 40 C.F.R. Part 2, Subpart B. If you do not assert a business confidentiality claim when you submit the information, EPA may make this information available to the public without further notice. You should be aware, moreover, that pursuant to Section 114(c) of the CAA and 40 C.F.R. § 2.301(a) and (f), emissions data, standards, and limitations are not entitled to confidential treatment and shall be made available to the public notwithstanding any assertion of a business confidentiality claim. Appendix C provides additional information regarding the meaning and scope of the term “emissions data.”

This information request is not subject to the Paperwork Reduction Act, 44 U.S.C. § 3501 *et seq.*, because it seeks collection of information from specific individuals or entities as part of an administrative action or investigation.

We may use any information submitted in response to this request in an administrative, civil or criminal action.

Failure to comply fully with this information request may subject Winchester to an enforcement action under Section 113 of the CAA, 42 U.S.C. § 7413.

You should direct any questions about this information request to Jennifer Wilson at (312)353-3115 or Kushal Som at (312) 353-5792.

Date

5/29/14

  
George T. Czerniak  
Director  
Air and Radiation Division

## **Appendix A**

When providing the information requested in Appendix B, use the following instructions and definitions.

### **Instructions**

1. Provide a separate narrative response to each question and subpart of a question set forth in Appendix B.
2. Precede each answer with the number of the question to which it corresponds and at the end of each answer, provide the name, title, and employer of the person(s) who provided information used or considered in responding to that question, as well as each person consulted in the preparation of that response.
3. Indicate on each document produced, or in some other reasonable manner, the number of the question to which it corresponds.
4. When a response is provided in the form of a number, specify the units of measure of the number in a precise manner.
5. Where information or documents necessary for a response are neither in your possession nor available to you, indicate in your response why the information or documents are not available or in your possession, and identify any source that either possesses or is likely to possess the documents or information.
6. If information not known or not available to you as of the date of submission later becomes known or available to you, you must supplement your response. Moreover, should you find at any time after the submission of your response that any portion of the submitted information is false or incorrect, you must notify EPA as soon as possible.

### **Electronic Submissions**

To aid in our electronic recordkeeping efforts, we request that you provide all documents responsive to this information request in an electronic format according to paragraphs 1 through 6, below. These submissions are in lieu of hard copy.

1. Provide all responsive documents in Portable Document Format (PDF) or similar format, unless otherwise requested in specific questions. If the PDFs are scanned images, perform at least Optical Character Recognition (OCR) for "image over text" to allow the document to be searchable. Submitters providing secured PDFs should also provide unsecured versions for EPA use in repurposing text.
2. When specific questions request data in electronic spreadsheet form, provide the data and corresponding information in editable Excel or Lotus format, and not in image format. If Excel or Lotus formats are not available, then the format should

allow for data to be used in calculations by a standard spreadsheet program such as Excel or Lotus.

3. Provide submission on physical media such as compact disk, flash drive or other similar item.
4. Provide a table of contents for each compact disk or flash drive containing electronic documents submitted in response to our request so that each document can be accurately identified in relation to your response to a specific question. *We recommend the use of electronic file folders organized by question number.* In addition, each compact disk or flash drive should be labeled appropriately (e.g., Company Name, Disk 1 of 4 for Information Request Response, Date of Response).
5. Documents claimed as confidential business information (CBI) must be submitted on separate disks/drives apart from the non-confidential information. This will facilitate appropriate records management and appropriate handling and protection of the CBI. Please follow the instructions in Appendix C for designating information as CBI.
6. Certify that the attached files have been scanned for viruses and indicate what program was used.

#### **Definitions**

All terms used in this information request have their ordinary meaning unless such terms are defined in the CAA, 42 U.S.C. §§ 7401 *et seq.*

1. The terms “document” and “documents” shall mean any object that records, stores, or presents information, and includes writings, memoranda, records, or information of any kind, formal or informal, whether wholly or partially handwritten or typed, whether in computer format, memory, or storage device, or in hardcopy, including any form or format of these. If in computer format or memory, each such document shall be provided in translation to a form useable and readable by EPA, with all necessary documentation and support. All documents in hard copy should also include attachments to or enclosures with any documents.
2. The terms “relate to” or “pertain to” (or any form thereof) shall mean constituting, reflecting, representing, supporting, contradicting, referring to, stating, describing, recording, noting, embodying, containing, mentioning, studying, analyzing, discussing, evaluating or relevant to.
3. The term wind rose shall mean a graphical depiction of wind speed and direction frequencies at a particular location.

## **Appendix B**

### **Information You Are Required to Submit to EPA**

The following monitoring, results, and general information for Olin Corporation, Winchester Division (Winchester) in East Alton, Illinois (the Facility) must be installed/provided in accordance with the foregoing Request for Information pursuant to the Clean Air Act within the specified time frames:

#### **Lead Monitor and Siting**

1. Winchester must develop wind roses for the area around the East Alton, Illinois facility using locally collected (or nearest available) meteorological data gathered over the most recent past 5 years. A total of five wind roses should be developed: one wind rose that includes all five years of data, and four seasonal wind roses over the five-year period. Winchester must also do dispersion modeling with the American Meteorological Society/Environmental Protection Agency Regulatory Model (AERMOD) to determine the areas of highest concentration of lead. Prior to performing the modeling, Winchester must submit a modeling protocol for EPA's review and approval. For general guidance and AERMOD implementation recommendations, Winchester must consult Appendix W, the AERMOD User's Guide and Addendum, and the AERMOD implementation Guide. Winchester shall also refer to the AERMOD ancillary programs' user guides, AERMOD Meteorological Processor, AERMET; the terrain preprocessor for AERMOD, AERMAP; and the tool to provide surface characteristics to AERMET, AERSURFACE, for other recommendations in preparation for AERMOD runs. Winchester must site a monitoring station in ambient air, as defined by 40 CFR Part 50.1, at the point along Winchester's property boundary nearest to the highest modeled lead concentration.
2. Within 14 days after receipt of this request, Winchester shall submit the wind rose and AERMOD modeling protocol to EPA for approval.
3. Within 14 days after EPA's approval of the modeling protocol, Winchester must submit the AERMOD results and the proposed monitoring site location for review and approval prior to establishing the monitoring station.
4. Within 14 days after receipt of this request, Winchester shall submit to EPA a map showing the locations of each emission unit stack, the property lines of the facility, all fencing or other barriers of the facility used to keep the public away from the facility, the locations of nearby residences, and the proposed location of the monitoring station. The map should also identify the stack from the Lower Billet Melt Kettle that was tested on September 19, 2013, in accordance with the directions provided in EPA's Information

Request mailed to Winchester on June 20, 2013, and the stack that was tested on October 22 and 23, 2013.

5. Winchester shall also submit a table that correlates with the map to be provided in response to Question 4. The table shall describe the process(es) that emit(s) pollutants from each stack. The table shall identify each pollutant emitted from each stack. All air pollution controls associated with the processes and stacks should be included in the description.
6. Winchester must install, operate, and maintain an ambient air monitoring station containing a total suspended particulates (TSP) lead sampler. The monitoring station and monitoring equipment must be installed within **twenty-eight (28) days** after approval of the monitoring site by EPA and must conform to the requirements as follows:
  - a. A TSP sampler design that meets the requirements of 40 CFR, Part 50, Appendix B, Reference Method for the Determination of Suspended Particulate Matter in the Atmosphere (High-Volume Method);
  - b. All monitoring siting criteria in 40 CFR Part 58 Appendix E;
  - c. All quality assurance criteria in 40 CFR Part 59 Appendix A;
  - d. Collection of lead samples on the standard 1-in-3 day schedule, as posted on EPA's website (<http://epa.gov/ttn/amtic/calendar.html>).
  - e. Analysis of TSP filters using an approved equivalent Pb method on this list: <http://www.epa.gov/ttn/amtic/files/ambient/criteria/reference-equivalent-methods-list.pdf>;
7. Winchester must follow the operating procedures identified in the "Quality Assurance Handbook for Air Pollution Measurement Systems" (located at <http://www.epa.gov/ttn/amtic/qabook.html>), 40 CFR Part 58 Appendix A and any specified procedures in the manufacturer's maintenance manual for the unit used to monitor lead.
8. Winchester shall be responsible for all maintenance associated with the lead monitor. Maintenance must include, at a minimum, the replacement of any equipment and cleaning on a schedule specified in the manufacturer's maintenance manual. Winchester must be responsible for ordering and paying for any necessary replacement parts, accessories, maintenance, etc. Winchester must be responsible for properly changing the TSP filters in all sampling devices.
9. Winchester shall conduct continuous lead monitoring for at least one year from the date of installation of the lead monitor.
10. Filters from the TSP instruments must be archived for at least two years.

### **Wind Speed and Direction Monitoring**

11. Winchester must install a meteorological tower at a location representative of local wind conditions. At a minimum, the meteorological tower must continuously measure and record wind speed and wind direction at one-hour intervals throughout the entire ambient monitoring period. Reports and records must be maintained and/or submitted in accordance with the paragraphs below.
12. The meteorological monitoring station must follow the Quality Assurance Handbook for Air Pollution Measurement Systems Volume IV: Meteorological Measurements Version 2.0 (Final) found at:  
[http://www.epa.gov/ttnamtl/files/ambient/met/Volume%20IV\\_Meteorological\\_Measurements.pdf](http://www.epa.gov/ttnamtl/files/ambient/met/Volume%20IV_Meteorological_Measurements.pdf)
13. Winchester shall be responsible for maintenance associated with the meteorological tower on a schedule specified in the manufacturer's maintenance manual. Winchester shall be responsible for ordering and paying for any necessary replacement parts, accessories, maintenance, etc.

### **General Monitoring Requirements**

14. Within 14 days after approval of the monitoring sites, Winchester must submit a Quality Assurance Project Plan (QAPP) to EPA for review and approval. The guidance document for writing a QAPP is "EPA Guidance for Quality Assurance Project Plans," EPA QA/G-5, EPA/600/R-02/009 - December 2002. The guidance is available at <http://www.epa.gov/QUALITY/qs-docs/g5-final.pdf>. Any measures identified by this information request should be incorporated into the QAPP.
15. Winchester must provide EPA and/or IEPA personnel access to the site location and respond to any inquiries regarding monitor siting, operations, or maintenance. In the event that an inspector or auditor identifies problems, Winchester must take appropriate corrective actions. Any changes made to monitor siting, operations, or maintenance must be approved by the EPA prior to the change.
16. Winchester must keep a daily log and monthly reports of the following information:
  - a. monitoring data, as submitted to EPA;
  - b. any monitoring system downtime (date, time, duration, and reason) along with any corrective actions taken;
  - c. meteorological measurements, including at least temperature, wind direction, rain/snowfall, and atmospheric pressure, for each day that samples are taken and the source of the meteorological measurements; and

Data from each monitor and wind monitoring station must be downloaded as **ASCII comma-delimited files** and provided to EPA on CD every month. The files should have a single "header" row, with all following rows being individual records, and all columns



being a single variable according to the header row. The files should also be saved at the Facility at a readily accessible location for five years after the latest date the monitoring is completed.

17. Monthly reports must be submitted within 14 days of the end of the month to EPA each month for a period of one year. At the end of the one year time frame, EPA will re-evaluate and adjust, if necessary, the Section 114(a) request. Winchester must submit these monthly reports to the following individual:

Attn: Compliance Tracker, AE-17J  
Air Enforcement and Compliance Assurance Branch  
U.S. Environmental Protection Agency  
Region 5  
77 West Jackson Boulevard  
Chicago, Illinois 60604

**Additional Information**

18. Provide a brief description of how lead is utilized at your facility. Within the last year, which raw materials and products had lead in them?

## Appendix C

### Confidential Business and Personal Privacy Information

#### Assertion Requirements

You may assert a business confidentiality claim covering any parts of the information requested in the attached Appendix B, as provided in 40 C.F.R. § 2.203(b).

Emission data provided under Section 114 of the CAA, 42 U.S.C. § 7414, is not entitled to confidential treatment under 40 C.F.R. Part 2.

“Emission data” means, with reference to any source of emissions of any substance into the air:

Information necessary to determine the identity, amount, frequency, concentration or other characteristics (to the extent related to air quality) of any emission which has been emitted by the source (or of any pollutant resulting from any emission by the source), or any combination of the foregoing;

Information necessary to determine the identity, amount, frequency, concentration or other characteristics (to the extent related to air quality) of the emissions which, under an applicable standard or limitation, the source was authorized to emit (including to the extent necessary for such purposes, a description of the manner and rate of operation of the source); and

A general description of the location and/or nature of the source to the extent necessary to identify the source and to distinguish it from other sources (including, to the extent necessary for such purposes, a description of the device, installation, or operation constituting the source).

40 C.F.R. § 2.301(a)(2)(i)(A),(B) and (C).

To make a confidentiality claim, submit the requested information and indicate that you are making a claim of confidentiality. Any document for which you make a claim of confidentiality should be marked by attaching a cover sheet stamped or typed with a caption or other suitable form of notice to indicate the intent to claim confidentiality. The stamped or typed caption or other suitable form of notice should employ language such as “trade secret” or “proprietary” or “company confidential” and indicate a date, if any, when the information should no longer be treated as confidential. Information covered by such a claim will be disclosed by EPA only to the extent permitted and by means of the procedures set forth at Section 114(c) of the CAA and 40 C.F.R Part 2. Allegedly confidential portions of otherwise non-confidential documents should be clearly identified. EPA will construe the failure to furnish a confidentiality claim with your response to the Request to Provide Information as a waiver of that claim, and the information may be made available to the public without further notice to you.

## Determining Whether the Information is Entitled to Confidential Treatment

All confidentiality claims are subject to EPA verification and must be made in accordance with 40 C.F.R. § 2.208, which provides in part that you must satisfactorily show that you have taken reasonable measures to protect the confidentiality of the information and that you intend to continue to do so; that the information is not and has not been reasonably obtainable by legitimate means without your consent and that disclosure of the information is likely to cause substantial harm to your business's competitive position.

Pursuant to 40 C.F.R. Part 2, Subpart B, EPA may at any time send you a letter asking that you support your confidential business information (CBI) claim. If you receive such a letter, you must respond within the number of days specified by EPA. Failure to submit your comments within that time would be regarded as a waiver of your confidentiality claim or claims, and EPA may release the information. If you receive such a letter, EPA will ask you to specify which portions of the information you consider confidential **by page, paragraph, and sentence**. Any information not specifically identified as subject to a confidentiality claim may be disclosed to the requestor without further notice to you. For each item or class of information that you identify as being CBI, EPA will ask that you answer the following questions, giving as much detail as possible:

1. For what period of time do you request that the information be maintained as confidential, e.g., until a certain date, until the occurrence of a special event, or permanently? If the occurrence of a specific event will eliminate the need for confidentiality, please specify that event.
2. Information submitted to EPA becomes stale over time. Why should the information you claim as confidential be protected for the time period specified in your answer to question number 1?
3. What measures have you taken to protect the information claimed as confidential? Have you disclosed the information to anyone other than a governmental body or someone who is bound by an agreement not to disclose the information further? If so, why should the information still be considered confidential?
4. Is the information contained in any publicly available databases, promotional publications, annual reports or articles? Is there any means by which a member of the public could obtain access to the information? Is the information of a kind that you would customarily not release to the public?
5. Has any governmental body made a determination as to confidentiality of the information? If so, please attach a copy of the determination.
6. For each category of information claimed as confidential, **explain with specificity** why release of the information is likely to cause substantial harm to your competitive position. Explain the specific nature of those harmful effects, why they should be viewed as substantial and the causal relationship between

disclosure and such harmful effects. How could your competitors make use of this information to your detriment?

7. Do you assert that the information is submitted on a voluntary or a mandatory basis? Please explain the reason for your assertion. If you assert that the information is voluntarily submitted information, explain whether and why disclosure of the information would tend to lessen the availability to EPA of similar information in the future.
8. Is there any other information you deem relevant to EPA's determination regarding your claim of business confidentiality?

If you receive a request for a substantiation letter from the EPA, **you bear the burden of substantiating your confidentiality claim.** Conclusory allegations will be given little or no weight in the determination. In substantiating your CBI claim(s), you must bracket all text so claimed and mark it "CBI." Information so designated will be disclosed by EPA only to the extent allowed by and by means of the procedures set forth in 40 C.F.R. Part 2, Subpart B. If you fail to claim the information as confidential, it may be made available to the public without further notice to you.

#### **Personal Privacy Information**

Please segregate any personnel, medical and similar files from your responses and include that information on a separate sheet(s) marked as "Personal Privacy Information."

**CERTIFICATE OF MAILING**

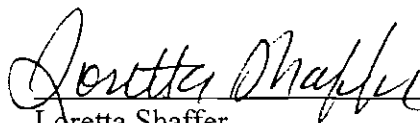
I, Loretta Shaffer, certify that I sent a Request to Provide Information Pursuant to the  
Clean Air Act by Certified Mail, Return Receipt Requested, to:

Michael L. Roark  
Director, Environmental, Health & Safety  
Olin Corporation, Winchester Division  
600 Powder Mill Road, Z3220  
East Alton, IL 62024

I also certify that I sent a copy of the Request to Provide Information Pursuant to the  
Clean Air Act by First-Class Mail to:

Eric Jones,  
Manager, Compliance Unit  
Bureau of Air  
Illinois Environmental Protection Agency  
P.O. Box 19506  
Springfield, Illinois 62794

On the 4 day of June 2014.



Loretta Shaffer  
Administrative Program Assistant  
Planning and Administration Section

CERTIFIED MAIL RECEIPT NUMBER:

7009 1680 0000 7676 3514